



CDSS

JOHN A. WAGNER
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
744 P Street • Sacramento, CA 95814 • www.cdss.ca.gov



ARNOLD SCHWARZENEGGER
GOVERNOR

July 17, 2008

Jean Dickinson, Director
Inyo County Department of Health & Human Services
P.O. Drawer H
Independence, CA 93525

Dear Ms. Dickinson:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided the reviewer from our office during the course of the Civil Rights Compliance Review of Inyo County. Enclosed is the final report on the review.

There were some compliance issues identified in the report, which will require the development of a corrective action plan. Please submit your plan within sixty days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the attached report.

We will provide a copy of our report to any individual who makes a request since our report is a public document. If you would like us to include a copy of your corrective action plan when responding to these requests, please indicate this when submitting your plan.

If you need technical assistance in the development of your plan, please feel free to contact the Civil Rights Bureau at (916) 654-2107 (voice) / (916) 654-2098 (TDD). You may also contact us by e-mail at crb@dss.ca.gov.

Sincerely,

RAMÓN S. LOPEZ, Chief
Civil Rights Bureau
Human Rights and Community Services Division

Enclosure

c: Leah M. Bovee, Civil Rights Coordinator

Steve Hemmerling, CDSS Food Stamps
Field Operations Bureau

Corrective Action/Management Evaluation Unit, M.S. 16-32

Mike Papin, CDSS Food Stamps

Food Stamps Policy Bureau/Policy Development Unit, M.S. 16-32

**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
COUNTY OF INYO**

Conducted April 22 – April 24, 2008

**California Department of Social Services
Human Rights and Community Services Division**

**Civil Rights Bureau
744 P Street, M.S. 6-70
Sacramento, CA 95814
(916) 654-2107**

Reviewed by Cindy Guzman

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CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the Inyo Department of Social Services with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on April 22 – April 24, 2008 with Leah Bovee, Civil Rights Coordinator. An exit interview was held with Linda Benson, Assistant Director of Health and Human Services, Tamara Joseph, Supervisor of Health and Human Services, Kathy E. Rose, System Support Analyst of Health and Human Services, Leah Bovee, Administrative Analyst/Civil Rights Coordinator, Anna Scott, Management Analyst of Health and Human Services and Dawndee Rossy, Supervisor of Health and Human Services to review the findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
Bishop Career Service Center	912 North Main Street Bishop, CA	Food Stamps, CalWORKS	Spanish
Department of Health and Human Services	162 Grove Street Bishop, CA	Children's Services Adult Services/IHSS	Spanish
Lone Pine Office	380 N. Mt. Whitney Drive Lone Pine, CA	Food Stamps, CalWORKS, Employment	Spanish

Inyo County stated they do not see clients at the Death Valley office at this time, therefore the Death Valley office was not part of this year's compliance review.

II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2008 Annual Civil Rights Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Workers	5	1
Children Social Workers	1	
Adult Program Workers	1	
Receptionist/Screeners	2	
Total	9	1

Program Manager Surveys

Number of surveys distributed	3
Number of surveys received	3

Reviewed Case Files

English speakers' case files reviewed	10
Non-English or limited-English speakers' case files reviewed	40
Languages of clients' cases	Spanish and English

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section IX of the report is reserved for a declaration of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings

Access to Services, Information and Outreach	Yes	No	Some-times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X			Through mail-ins and home visits. Lone Pine has applications available outside of building.
Does the county have extended hours to accommodate clients?	X			Extended hours are made available through appointments when needed.
Can applicants access services when they cannot go to the office?	X			Through phone system and home visits if necessary.
Does the county ensure the awareness of available services for individuals in remote areas?	X			Through home visits, handouts, flyers, and outreach through other agencies.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13)? Is the pamphlet distributed and explained to each client at intake and re-certification?	X			Yes, the Pub 13 is provided with application packet and distributed and explained to each client. All staff interviewed aware of this procedure.
Was the current version of Pub 13 available in English, Spanish, Lao, Vietnamese, Chinese, Hmong, Russian, Korean, Farsi, Arabic, Laotian, Tagalog, Armenian and Cambodian?	X			
Was the Pub 13 available in large print, audiocassette and Braille?	X			
Were the current versions of the required posters present in the lobbies?	X			
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	X			
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?			X	912 Bishop needs all directional signs posted to be in appropriate languages. Lone Pine needs "No Public Restrooms" sign also to be in Spanish.

B. Corrective Actions

Informational Element	Corrective Action Required
Directional signage	Div 21.107-212

C. Recommendation

The most recent version for each of the above referenced documents is:

Pub 13	"Your Rights under California Welfare Programs"	08/06
Pub 86	"Everyone is Different, but Equal Under the Law"	03/07
Form AD 475B	"And Justice for All"	12/99

Contact your program consultant to receive the most recent versions, or download the Pub 13 from the CRB website http://www.dss.cahwnet.gov/civilrights/YourRights_498.htm.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

A. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

Facility Location: Bishop Career Center, 912 N. Main, Bishop

Facility Element	Findings	Corrective Action
Parking	<p>*Repeat Finding: There is no "unauthorized parking" signage provided.</p>	<p>Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17" by 22" min. in size with lettering 1" min. high, stating: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner's expense. Towed vehicles may be reclaimed at _____ or by telephoning _____." (CA T24 1129B.5) p. 133</p>
	<p>*Repeat Finding: There is adequate accessible parking, however, the accessible parking does not meet the required measurements. The space is not van accessible as indicated.</p>	<p>One in every 8 accessible spaces (p. 136) and no less than 1 shall be served by an access aisle 96" wide minimum placed opposite the driver's side and shall be designated Van-Accessible (CA T24 1129.B.4.2</p>

	<p>Accessible parking space is not located as near as practical to the primary entrance. There is parking next to entrance that is marked as a loading zone. (See recommendation)</p> <p>Length of parking on one side is short at 16' and the Van access aisle is not located on the passenger side.</p> <p>Client must cross the parking lot to ramp. (See recommendation)</p> <p>Repeat Finding: There is no "NO PARKING" painted on the pavement in the access aisles.</p>	<p>Accessible parking spaces shall be located as near as practical to a primary entrance and shall have the appropriate required number of spaces T24 CCR 1129B.1; ADAAG 4.1.2(5)(a)</p> <p>Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p. 135</p> <p>Van access aisle shall be 18' x 8' minimum on passenger side. (CA T24 1129 B.4.1, ADA 4.6.3) p. 135</p> <p>Access aisles (load and unload) must connect to the accessible path of travel, including curb cuts or ramps as needed (CA T24 1129B.4.3, ADA 4.6.3) p. 136</p> <p>Walkways minimum 48" (CA T24 1133B.7.1) p. 160</p> <p>The words "NO PARKING" shall be painted on the ground in each 5' or 8' loading and unloading access aisle in white letters no smaller than 12". (CA T24 1129B.4.1 & 2) p. 135</p>
Exterior entrance	Repeat Finding: Force to open the entrance door measured approximately 10 pounds.	Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195
Restroom (Unisex)	Counter too high at 36"	Sink is mounted with a counter or rim no higher than 34". (ADA 4.24.2 & 4.19.2) pp. 311, 267

	Toilet Protector too high at 46"	If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA T24 1115B.9.2 and CA T24 1115B.9.1.2, ADA 4.19.6) p. 269
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B. Recommendation: A path of accessibility should be marked connecting the parking space to the front door ramp. If the County decides to use the parking spaces closest to the building, where the "loading zone" is located, the parking would have to meet the accessible parking requirements.

A. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

Facility Location: 162 J. Grove Street, Bishop

Facility Element	Findings	Corrective Action
Parking	*Repeat Finding There is no "Unauthorized parking" signage at entrance to off street accessible parking.	Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17" by 22" min. in size with lettering 1" min. high, stating: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner's expense. Towed vehicles may be reclaimed at _____ or by telephoning _____." (CA T24 1129B.5) p. 133

	<p>There is one accessible parking space marked as Van Accessible, however, the Van access aisle is short at 5' access on passenger side.</p> <p>On pavement wheelchair w/occupant signage is faded and needs repainting.</p> <p>The words "No Parking" is not painted in access aisle.</p> <p>Persons with disabilities are forced to go in the public street to get to Accessible ramp since the access aisle next to the sidewalk is too steep and not in compliant.</p>	<p>Van access aisle shall be 18' x 8' minimum on passenger side. (CA T24 1129 B.4.1, ADA 4.6.3) p. 135</p> <p>Pavement signage shall be 36" x 36" minimum, white on blue in color, visible and centered. (CA T24 1129B.5.1 & 2) p. 133</p> <p>The words "NO PARKING" shall be painted on the ground in each 5' or 8' loading and unloading access aisle in white letters no smaller than 12". (CA T24 1129B.4.1 & 2) p. 135</p> <p>Access aisles (load and unload) must connect to the accessible path of travel, including curb cuts or ramps as needed (CA T24 1129B.4.3, ADA 4.6.3) p. 136</p> <p>Walkways minimum 48" (CA T24 1133B.7.1) p. 160</p>
Exterior entrance	No (ISA) International symbol of Accessibility at main entrance.	A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.8.1.2) pp. 183, 353

	<p>No (ISA) symbol</p> <p>*Repeat Finding Door pressure too heavy at 16 pounds.</p>	<p>Characters, symbols and their backgrounds have a non-glare finish. Characters and symbols contrast with their background, either light characters on a dark background or dark characters on a light background. (CA T24 1117B.5.2, ADA 4.30.5) p. 355</p> <p>Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195</p>
Client lobby	*Repeat Finding Accessible Counter too high, however work around plan is in effect to assist client at table or with clip board.	Height of accessible tables or counters is between 28" – 34" from floor finish. (CA T24 1122B.4, ADA 4.32.4) p. 349
Restroom Unisex	The one unisex restroom has accessible signage on door, however needs wall signage.	<p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p. 263</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p. 263</p>

A. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

Facility Location: 380 N. Mt. Whitney, Lone Pine.

Facility Element	Findings	Corrective Action
Parking	*Repeat Finding No "unauthorized parking" signage at entrance to off street accessible parking.	Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17" by 22" min. in size with lettering 1" min. high, stating: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner's expense. Towed vehicles may be reclaimed at _____ or by telephoning _____. " (CA T24 1129B.5) p. 133
	There is one designated Van accessible space however it does not meet requirements.	One in every 8 accessible spaces (no less than 1) shall be designated van accessible. (CA T24 1129B.4.2, ADA 4.1.2(5)(b)) pp. 135, 136
	Freestanding sign too low at 57"	Sign height shall be 80" minimum from bottom of sign to top of finish grade. (CA T24 1129B.5, ADA 4.6.5) p. 133
	Van Accessible space access too short at 15' long.	Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p 135 Van access aisle shall be 18' x 8' minimum on passenger side. (CA T24 1129 B.4.1, ADA 4.6.3) p. 135

	<p>No clearance access aisle on passenger side of van space.</p> <p>*Repeat Finding: No "No Parking" painted on pavement in access aisles.</p> <p>*Repeat Finding: There is no access aisles connected to the accessible path of travel.</p> <p>*Repeat Finding: Accessible parking not located at nearest possible entrance.</p>	<p>One in every 8 accessible spaces (p 136) and no less than 1 shall be served by an access aisle 96" wide minimum placed opposite the driver's side and shall be designated Van-Accessible (CA T24 1129.B.4.2, ADA 4.1.2(5)(b)) p. 135</p> <p>The words "NO PARKING" shall be painted on the ground in each 5' or 8' loading and unloading access aisle in white letters no smaller than 12". (CA T24 1129B.4.1 & 2) p. 135</p> <p>Access aisles (load and unload) must connect to the accessible path of travel, including curb cuts or ramps as needed (CA T24 1129B.4.3, ADA 4.6.3) p. 136</p> <p>Walkways minimum 48" (CA T24 1133B.7.1) p. 160</p> <p>Located on shortest accessible route. (CA T24 1129B.1.2, ADA 4.3.2(1)) p. 131</p>
Exterior entrance	<p>*Repeat Finding: No accessible signage at entrance. No directional signage to accessible entrance, if not at main entrance.</p>	<p>A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.8.1.2) pp. 183, 353</p>

	<p>*Repeat Finding: No (ISA) International Symbol of Accessibility signs with non-glare finish, color contrast.</p> <p>*Repeat Finding: Door pressure too heavy at 9 pounds.</p>	<p>Characters, symbols and their backgrounds have a non-glare finish. Characters and symbols contrast with their background, either light characters on a dark background or dark characters on a light background. (CA T24 1117B.5.2, ADA 4.30.5) p. 355</p> <p>Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195</p>
Client lobby	<p>*Repeat Finding: Counter too high at 45". Client would need assistance.</p>	<p>Height of accessible tables or counters is between 28" – 34" from floor finish. (CA T24 1122B.4, ADA 4.32.4) p. 349</p>

- B. Recommendation: It is recommended to have an accessible table in the lobby to accommodate persons with disabilities.**
Recommendation regarding Restrooms: (Lone Pine Office is a leased building)
The Lone Pine office restrooms are not in compliance, therefore the County has a sign stating "No Public Restrooms available" on lobby door. This sign should be in all appropriate languages and states that all public restrooms are available at the hospital. The above alternative is to be used until accessible restrooms can be constructed to meet all clients' needs.

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action (NOA) be in the individuals' primary language.

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

Question	Yes	No	Some-times	Comments
Does the county identify a client's language need upon first contact? How?	X			The County uses a Language Identification card and has outside full-service translations services if the bilingual worker is not available.
Does the county use a primary language form?	X			They use the DFA 285A form to identify primary language.
Does the client self-declare on this form?	X			
Are non-English- or limited- English-speaking clients provided bilingual services?	X			The County utilizes one Spanish bilingual worker as well as community bilingual interpreters if needed.
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	-	-	-	The County assigns all Spanish cases to the bilingual worker. If she is not available then the workers know the process for utilizing the county's interpreter list of Tele-interpreters.
Is there a delay in providing services?		X		
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			The County uses the bilingual worker, county listings of certified interpreters and a telephone interpreter services.

Question	Yes	No	Some-times	Comments
Are county interpreters determined to be competent?	X			The workers are determined competent at hiring by an oral and written exam.
Does the county have adequate interpreter services?	X			Inyo county is a small county and has adequate interpreter services.
Does the county allow minors to be interpreters? If so, under what circumstances?		X		Only in an emergency.
Does the county allow the client to provide his or her own interpreter?	X			
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			
Does the county use the CDSS-translated forms in the clients' primary languages?	X			Of the cases that I reviewed, the notices were in the correct language or both English and non-English.
Is the information that is to be inserted into NOA translated into the client's primary language?	X			
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?	X			The County had large print, Braille and taped text available.

Question	Yes	No	Some-times	Comments
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			Workers during my interviews stated that they make notation in the case folder indicating the disability and need.
Does the county offer screening for learning disabilities?	X			Through the CalWORKS program.
Is there an established process for offering screening?	X			
Is the client identified as having a learning disability referred for evaluation?	X			

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

Documented Item	Children's Services	Adult Programs	CalWORKs	Non-Assisted Food Stamps
Ethnic origin documentation	ER/Referral, WS/SMS, Various other documents.	SAWS 1	SAWS 1	DFA 285
Primary language documentation	Various documents	SAWS 1	SAWS 1	DFA 285
Method of providing bilingual services and documentation	Bi-lingual staff, telephone interpreter	County Bi-lingual staff is used.	County Bi-lingual staff is used.	County bilingual staff is used.

Documented Item	Children's Services	Adult Programs	CalWORKs	Non-Assisted Food Stamps
Client provided own interpreter	None Noted	None Noted	None Noted	None Noted
Method to inform client of potential problem using own interpreter	None Noted	None Noted	Workers stated that they verbally inform clients.	Workers state they verbally inform clients.
Release of information to Interpreter	None Noted	None Noted	None Noted	None Noted
Individual's acceptance or refusal of written material offered in primary language	None Noted	None Noted	None Noted	None Noted
Documentation of minor used as interpreter	None Noted	None Noted	None Noted	None Noted
Documentation of circumstances for using minor interpreter temporarily	None Noted	None Noted	None Noted	None Noted
Translated notice of actions (NOA) contain translated inserts	None Noted	None Noted	None Noted	None Noted
Method of identifying client's disability	ER/Referral form	None Noted	None Noted	Noted in case file.
Method of documenting a client's request for auxiliary aids and services	None Noted	None Noted	None Noted	None Noted

B. Corrective Actions

Areas of Action	Corrective Action
Documentation if client provided own interpreter	When applicants/recipients provide their own interpreter, the CWD shall ensure that the applicants/recipients are informed of the potential problems for ineffective communication. The CWD shall document in the case record that the applicants/recipients were so informed. Div. 21-116.23
Documentation of primary language	Each agency shall ensure that case record identification shows the applicant's/recipient's ethnic origin and primary language. Div. 21-201.21
Documentation that bilingual services were provided	Document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter. Div. 21-116.22
General	Inyo County must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance. Div. 21-116

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

Interview questions	Yes	No	Some-times	Comments
Do employees receive continued Division 21 Training?	X			Workers interviewed stated they have training at the beginning of employment and annually.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			
Does the county provide employees Cultural Awareness Training?	X			
Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?	X			
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X			

VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

A. Findings from Staff Interviews and Program Manager Surveys

Interview and review areas	Yes	No	Some-times	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?			X	Most employees knew the difference. However, a few did not understand the difference between the types of complaints.
Did the employees know who the Civil Rights Coordinator is?	X			All of the county staff interviewed is aware that Leah Bovee is the new CRC.
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	X			
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			

B. Corrective Action

Element	Corrective Action
Discrimination Process	Inyo County shall ensure staff have knowledge of the discrimination complaint process and are able to differentiate it from other complaint processes. Div. 21-117 and 21-203

IX. CONCLUSION

The CDSS found the employees of the Inyo County Department of Health and Human Services to be very helpful. We would like to thank the employees for their warm reception with a special thanks to Leah Bovee, Civil Rights Coordinator.

CDSS commends the County for providing excellent services to the culturally diverse population. We have noted there have not been any discrimination complaints in several years.

The Inyo County Department of Health and Human Services was found to be in compliance with most of the CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws. However, Inyo County does have some repeat findings regarding ADA compliance.

The Inyo County Department of Health and Human Services must remedy the violations identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule by which all actions will be taken to correct the violations.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.